



Code of Business Ethics and Conduct

1. Code of Business Ethics and Conduct

Ecorys attaches great importance to its reputation for conducting its business with integrity and with respect to the interests of those our activities can affect. This reputation is an asset, just as real as our people and brands.

We aim to run a profitable business and that means investing for growth and balancing short term and long term interests. It also means caring about our customers, employees, shareholders and suppliers, and the communities in which we conduct our operations. In the course of meeting our business objectives, we consider it essential that all employees understand and comply with our values and therefore share the Ecorys way of doing things.

The general principles of the “Ecorys way” are contained in this Code.

This Code of Business Ethics and Conduct is a core Ecorys statement and we commend it to all our stakeholders.

2. Standard of conduct

Ecorys conducts its business with honesty and integrity and with respect for the interests of our stakeholders.

3. Regulatory & legal compliance

Ecorys companies are required to comply with the laws and regulations of the countries in which they operate.

4. Employees

Ecorys companies are required to recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed. Ecorys is committed to provide safe and healthy working conditions for its employees worldwide. Ecorys believes it is essential to maintain good communications with employees, normally through company’s communication channels and tools, and consultation procedures.

5. Conflicts of Interest

Ecorys expects its employees to avoid personal activities and financial interests which could conflict with their jobs and responsibilities. A conflict of interest is any situation in which an employee’s personal interests, or interests that they owe to another organisation, may (or may appear to) influence or affect the employee’s decision-making for Ecorys.

Such conflicts can arise from personal relationships within or outside the workplace or through activities or interests outside the workplace, such as, but not limited to, political engagement, employments, directorships, shareholdings, voluntary work or association memberships.

The purpose of this policy is to protect the integrity of Ecorys’ decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of our employees.

Employees should not interpret our conflict of interest procedures as preventing or discouraging their being involved in leisure-time, community, political or other activities, or holding investments in other businesses. However, where these activities, interests or relationships give or could give rise to, or could be seen as giving rise to, a conflict of interest it is important that they are properly considered and, where appropriate, declared and registered.

Many conflicts can be avoided altogether, but where this is not possible, careful treatment is required, including transparency, declaration, appropriate authorisation, and possibly changed management of the decision in question.

This policy requires employees to:

- **Avoid** conflicts of interest where possible.
- If this is not possible, employees should **identify and disclose** any conflicts of interest. Employees must declare to their Line Manager any matter that potentially could or be perceived to influence their decisions or actions for Ecorys, giving your Line Manager all the relevant facts in writing.
- Employees must **register** their conflicts of interest in the Ecorys Register of Interests maintained by the Ecorys Compliance Officer and keep this registration up to date.
- Whether employees have registered any potential conflict of interests or not they must always **declare** them and be prepared to withdraw from any decision-making capable of being impacted by their conflict of interest, unless their Line Manager agrees in writing otherwise.

6. Promotional Activities

Ecorys neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests. Ecorys companies and employees are encouraged to promote and defend their legitimate business interests. In doing so they may either directly, or through bodies such as trade associations, raise questions and discuss particular government actions or decisions. Where their experience can be useful, they are encouraged to cooperate with governments, individuals, agencies and other organisations in the development of proposed legislation and other regulations which may affect such legitimate interests.

Ecorys companies and employees are also encouraged to respond to requests from governments and other agencies for information, observations or opinion on issues relevant to business and the community in which we operate.

7. Quality

Ecorys is committed to provide products which consistently offer value in terms of price and quality.

8. Environmental Issues

Ecorys is committed to run its business in an environmentally sound and sustainable manner. Our aim is to ensure that our processes and products have the minimum adverse environmental impact commensurate with the legitimate needs of the business.

9. Competition

Ecorys believes in vigorous yet fair competition and supports the development of appropriate competition laws. Employees receive guidance to ensure that they understand such laws and do not transgress them.

10. Reliability of Financial Reporting

Ecorys' accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

11. Bribery

Ecorys does not give or receive bribes in order to retain or bestow business or financial advantages. Ecorys employees are instructed that any demand for or offer of such bribes must be immediately rejected and notified. Detailed in the Ecorys UK Anti-Corruption and Bribery Policy.

12. Modern Slavery

The Ecorys Group of Companies support the UK Modern Slavery Act 2015 in all parts of its business services. We have a zero-tolerance approach to any form of modern slavery and human trafficking. Detailed in the Modern Slavery and Human Trafficking Policy.

13. Safeguarding Children and Vulnerable Adults

Ecorys UK is committed to ensuring that children and vulnerable adults that we come into contact with during the course of our work are protected. Safeguarding is about protecting certain people who may be in vulnerable circumstances.

A child is defined as someone who has not yet reached their 18th birthday.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

A vulnerable adult or 'Adult at risk' is defined as someone with care and support needs who are at risk from abuse or neglect. Detailed in the Ecorys UK Safeguarding Children and Vulnerable Adults Policy.

14. Application

This Code applies to Ecorys companies and employees throughout the world. Where Ecorys participates in joint ventures, the application of these principles will be actively upheld; this will significantly influence the decision to enter into or to continue in any joint venture.

15. Compliance

It is the responsibility of the Board of Management of Ecorys to ensure that the principles embodied in this Code are communicated to, and understood and observed by all employees. The Board of Management of Ecorys will not criticize management for any loss of business resulting from adherence to these principles. Equally, the Board of Management of Ecorys undertakes that no employee will suffer as a consequence of bringing to their attention, or that of senior management, a breach or suspected breach of these principles. The Ecorys UK Whistleblowing Policy sets out the way in which employees and similar individuals may raise concerns and the management response to a concern raised in this manner.